

From: Carolyn Yale
Sent: Friday, January 09, 2004 2:06 PM
To: Dabbs, Paul; Lisa Beutler; Lisa Beutler; Nick Di Croce
Subject: a few comments on parts of Chapter 1

Comments on Chapter 1-- DWR draft and other edits:

First off, I really like the goals for 2030 on page 9. Use these as themes to help winnow findings and recommendations. If we want objectives in Ch 1, fit them in a side box with reference to later chapter for more detail. I note there's a resource management strategies box; placing a water management objectives box in proximity would be useful.

Findings and Recommendations:

Unless otherwise noted, I refer to the shorter versions by Lloyd F and Nick because I completely agree with the sentiment that the Dec. 30 text needs trimming. Working off Lloyd F's edit of Nick's draft, with occasional cites of December 30 DWR draft, here are some of my reactions.

Findings:

* Finding #4 (LF): Delete reference to environmental restoration water from this bullet. Devote this bullet to the population issue.

* Provide a separate bullet which identifies the consequences of currently depleted and altered environmental water conditions. Modify #6: "California has experienced aquatic and riparian habitat degradation and freshwater biodiversity declines throughout the state. On many rivers and streams, flows have been depleted and altered. Loss of natural flows contributes to decline in ecosystem functions and species, impacts on commercial fisheries, and degraded water quality." Although there may be some BD Program successes, asserting that the decline is being reversed is premature; moreover, this isn't representative of all of California or even of all of the Central Valley- if we have a glimmer of hope for the San Joaquin.

* Bullet #7 (LF) is not quite supportable (shrinking?). A simple fix, which might be bolstered by details to make it more informative, could be: "In many areas California's surface and ground waters are impaired by natural and human-made contaminants. This degrades environmental resources, threatens human health, and increases costs of drinking water treatment." (Reference to the water resource as "supply" doesn't resonate in the ambient, environmental context, so I dropped this term. Note this could substitute for 14f on page 5 of Dec. 30 draft.)

* Provide a separate bullet addressing specific problems of ground water overdraft. Tracking Finding #8 of the December 30 draft: "The continued overdraft of some of California's groundwater basins has degraded water quality in some areas and is unsustainable in the long run." (Is Finding #8 drawn from Bulletin 118?)

* Findings in the DWR draft included some worthy subjects were cut from the Nick/LF edits. Consider retaining #9 - possibly expanding to address rural and disadvantaged community drinking water supply issues also. (Recall that I observed that findings 10 and 11 are couched more as recommendations, so I'd cut these.)

Recommendations:

* Reinstate a recommended action to better manage water as a public trust asset, under the leadership of the state but with regional and local roles as well. (Nick had language in his introductory bullet. The DWR language in #9 is weak; if we adhere to the findings on environment and water quality, it seems logical to conclude that more attention to the public trust is needed.)

* I assume we all recognize there are two key recommendation categories missing at the moment: investments and "legislation" (not limited to funding; actually, the key actions needed to carry out goals). Also, if we focus the recommendations solely on the table, this table should cover the implementation component better than the current version.

General comments on the December 30 version and critical issues, as discussed in the Jan. 5 workshop:

On the "government" polling of issues- understandably, the list reflects the interests of a very diverse group. Local government is very different, for example, from the various agencies representing pieces of the federal government. And among the latter, we have agencies whose mission is fundamentally "regulatory" (although the means may drift into incentives), or public lands management, or scientific work.... In attempting to read some of these federal interests into the issues list, I come up with the following clarifications/additions:

- * "Lack of data"= need for monitoring and assessment
- * "Emphasize urgency for action and consequences of inaction" and clarity regarding who's responsible; accountability.
- * Recommendations for legislation, where needed
- * Public trust (e.g., EPA in role of assisting state)

p. 11ff (DWR) on resource management strategies. I presume you're looking at sharpening this. For example, you could omit the paragraph starting, "While DWR does not have authority...."

You mention (in the last paragraph of this section) implementation impediments from a local and regional perspective. You could also acknowledge the work that will be needed to push forward on R&D, as well as other measures to reduce uncertainty and implementation barriers.

Carolyn Yale, Ph.D.
US EPA, WTR-3